

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

RAE ANDREACCHIO

PLAINTIFF

VS.

CIVIL ACTION NO.: 3:21-cv-00386-CWR-LGI

KAREN YAX

a/k/a "The Critical Kay"

DEFENDANT

**PLAINTIFF'S FIRST SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED TO
DEFENDANT**

Pursuant to the provisions of F.R.C.P. 33 and 34, Plaintiff Rae Andreacchio requests that Defendant Karen Yax answer the following interrogatories and requests for production of documents under oath and serve them upon Plaintiff within 30 days. These discovery requests shall be deemed continuing pursuant to F.R.C.P. 26(e) requiring seasonable supplementation to reflect new information that makes previous answers incorrect or incomplete.

In answering these discovery requests, you must furnish all information that is known or available to you, regardless of whether such information is processed directly by you or by your agents, unless privileged by your attorneys or by their agents, employees, and investigators. If any of these discovery requests cannot be answered in full, you must answer to the extent possible, specifying whatever knowledge or belief you may have relating to the unanswered portion.

The requested documents and tangible things shall be produced for inspection

and copying at PO Box 4814, Mississippi State, Mississippi 39762-4814

DEFINITIONS

A. Each discovery request seeks all information available to Plaintiff, her attorneys or agents, and all other persons acting on their behalf.

B. As used herein, the terms "Defendant," "you" or "your" mean without limitation, KAREN YAX, her attorneys, agents, and/or representatives.

C. As used herein, "identify" when used in the context of a person, means to provide that person's name and (if known) address and telephone number.

D. As used herein, the term "Plaintiff" means without limitation, RAE ANDREACCHIO, her attorneys, agents, officers, directors, and/or representatives.

E. As used herein, "document" or "record" are used in their broadest sense to mean every writing or recording of every type described in Rule 1001 of the Federal Rules of Evidence.

F. All information or documents to which Plaintiff claims any privilege or statutory authority as a ground for non-disclosure shall be identified by date, title, type of document, subject matter (without revealing the information as to which privilege or statutory authority is claimed), and the factual and legal basis for the non-disclosure.

G. If a document for which you claim privilege contains any information that is not privileged, you must produce the document, redacting only those portions for which you claim the privilege. You must provide a separate listing of

any documents so redacted, stating the specific factual and legal basis for the claimed privilege or specific statutory authority for non-disclosure.

H. When the identification and description of documents is requested, you may, in lieu of describing a document, attach legible copies of the document to the discovery response, provided that (a) each document is appropriately marked to identify the Interrogatory and/or Request for Production and, where applicable, the subpart(s) thereof to which the document is responsive; and (b) you attest to its authenticity in your answer.

I. If any document is responsive to any Interrogatory or Request for Production herein, but is no longer in the possession, custody or control of Plaintiff or his agents, state what disposition was made of it, why, when, and by whom.

J. "And" as well as "or" shall have both the conjunctive and disjunctive meanings, so as to have the most inclusive meaning possible.

K. The terms "relating to," "about," "concerning," or "regarding" shall have the most inclusive meaning possible, and shall mean describing, stating, evidencing, containing, discussing, embodying, reflecting, referring to, addressing, or otherwise relating to in any way, in whole or in part.

INTERROGATORIES

INTERROGATORY NO. 1. -- Please identify by name, address, telephone number, and email address every witness you intend to present at trial.

RESPONSE:

INTERROGATORY NO. 2. -- Identify each and every fact upon which you base your defenses to this case and identify (*see definitions above*) all persons who have knowledge of those facts.

RESPONSE:

INTERROGATORY NO. 3. -- Identify any and all statements made by Plaintiff – whether oral, written, or recorded on audiotape, videotape, or any other electronic or digital recording or storage format – that relate in any way to the facts of this case. Please include a verbatim recitation of such statement, or as near a paraphrase as possible.

RESPONSE:

INTERROGATORY NO. 4. -- Identify any and all statements made by each of the following persons – whether oral, written, or recorded on audiotape, videotape, or any other electronic or digital recording or storage format – that relate in any way to the facts of this case. Please include a verbatim recitation of such statement, or as near a paraphrase as possible.

A. Dylan Swearingen

B. Whitley Goodman

C. Matt Miller

D. Jett Miller

RESPONSE:

INTERROGATORY NO. 5. -- Identify all documents and tangible things known by you that relate in any way to the facts, matters, and/or allegations of the Plaintiff's Complaint, giving the location and custodian of each document.

RESPONSE:

INTERROGATORY NO. 6. -- Identify any and all persons whom you believe to have knowledge or information about any of the facts and circumstances forming the basis of Plaintiff's Complaint – including, but not limited to, any information that supports or refutes your defenses – and describe the facts about which each such person is believed to have knowledge.

RESPONSE:

INTERROGATORY NO. 7. -- If you have ever been convicted of a criminal offense, describe each offense with specificity.

RESPONSE:

INTERROGATORY NO. 8. -- Provide all other information that you intend to present at trial in your case-in-chief that has not already been covered by any of the preceding interrogatories.

RESPONSE:

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 1: Please produce any and all documents to which you refer in answering Plaintiff's Interrogatories.

RESPONSE:

REQUEST NO. 2: Please produce any photographs, video tapes, audio tapes, computer diskettes, or any other recordings of any type which relate in any way to the claims, possible defenses, or element of damages in this suit.

RESPONSE:

REQUEST NO. 3: Produce all documents reflecting any income earned by you, from whatever source, for the past ten (10) years, including tax returns, or other financial documentation, and any and all tax returns, income statements or similar documents reflecting profit or loss of any business or profit-making enterprise with which you are associated.

RESPONSE:

REQUEST NO. 4: Produce for inspection and copying any and all documents, emails, text messages, social media messages, photographs, video recordings, audio recordings, facsimiles, and other messages that relate in any way to the death of Christian Andreacchio .that you have received from any person

RESPONSE:

REQUEST NO. 5: Produce for inspection and copying any and all exhibits that you intend to produce at trial or at any deposition.

RESPONSE:

RESPECTFULLY SUBMITTED on the 19th day of May 2022,

/s/ Matthew D. Wilson

By: Matthew Wilson (MS Bar 102344)

PO Box 4814

Mississippi State, MS 39762

starkvillelawyer@gmail.com

T: (662) 312-5039

F: (662) 546-4893

VERIFICATION OF INTERROGATORIES

STATE OF MICHIGAN

COUNTY OF _____

I, KAREN YAX, do hereby affirm under penalty of perjury that the foregoing responses to interrogatories are true and correct to the best of my knowledge.

This, the ____ day of _____, 2022

KAREN YAX

So sworn and subscribed before me on this the ____ day of _____ 2022

NOTARY PUBLIC

MY COMMISSION EXPIRES:

RETURN CERTIFICATE OF SERVICE

I, Karen Yax do hereby certify that I have on this date transmitted the foregoing responses to **PLAINTIFF'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED TO DEFENDANT** to the following counsel of record via first class US mail

Matthew Wilson
PO Box 4814
Mississippi State MS 39762

This, the ____ day of _____, 2022.

CERTIFICATE OF SERVICE

I, Matthew D. Wilson, do hereby certify that I have served the foregoing Interrogatories and Requests for Production of Documents, upon the following party via U.S. Mail, postage prepaid, and/or email:

Ms. Karen Yax
2442 Lonesome Dove Trail
Lapeer, MI 48466
kaykaydoo2@gmail.com

Respectfully submitted this the 19th day of May 2022.

By: /s/ Matthew Wilson
Matthew Wilson